

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

**GAIL O'NEIL, as next friend to her  
minor daughter** §  
**Plaintiff,** §  
§  
v. § **Civil Action No. 2:10-CV-3-J**  
§  
**TEXAS DEPARTMENT** §  
**OF CRIMINAL JUSTICE, *et al.*,** §  
**Defendants.** §

**DEFENDANTS' DESIGNATION OF EXPERTS**

TO THE HONORABLE JUDGE OF THE DISTRICT COURT:

NOW COME Defendants Joe S. Nunn, Hugo Orozco, Kevin Andis, Robin Pena, Michael Savers, John Heuerman, Jr., Brad Livingston and the Texas Department of Criminal Justice, by and through their attorney of record, the Attorney General for the State of Texas, and file this **Designation of Experts**, and in support thereof, offer the following:

Defendants hereby designate the following:

1. Bill Calhoun, MD  
J. Andrew Grant, MD  
Department of Internal Medicine  
University of Texas Medical Branch  
301 University Boulevard  
Galveston, Texas 77555-0561  
(409) 772-2436  
(409) 772-9532 fax

Dr. Grant or Dr. Calhoun will give expert testimony and opinions regarding plaintiff's medical condition, treatment while incarcerated at the Jordan Unit.

2. Bill Stephens  
Office of the Deputy Director  
Prison/Jail Operations  
PO Box 99  
Huntsville, Texas 77342  
936/437-6318 office  
936/437-8725 fax

Mr. Stephens will testify regarding Texas Department of Criminal Justice policies and procedures. He will give specific testimony regarding the conduct of the correctional staff immediately before, during, and after Plaintiff died.

3. Warden Joe Nunn  
Johnston SAFFP Unit  
703 Airport Road  
Winnsboro, Texas, 75494

Mr. Nunn will testify regarding Texas Department of Criminal Justice policies and procedures. He will give specific testimony regarding the conduct of the correctional staff immediately before, during, and after Plaintiff died.

4. Nizam Peerwani  
Tarrant County Medical Examiners Office  
200 Feliks Gwordz Place  
Fort Worth, Texas, 76104  
817-920-5700

Dr. Peerwani will testify regarding the cause of death of Shermaine Peterson.

Respectfully submitted,

GREG ABBOTT  
Attorney General of Texas

C. ANDREW WEBER  
First Assistant Attorney General

DAVID S. MORALES  
Deputy Attorney General for Civil Litigation

DAVID A. TALBOT, JR.  
Assistant Attorney General  
Chief, Law Enforcement Defense Division

/s/ Bruce R. Garcia  
BRUCE R. GARCIA  
Assistant Attorney General  
Attorney-in-Charge  
State Bar No. 07631060

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**ATTORNEYS FOR DEFENDANTS**

**NOTICE OF ELECTRONIC FILING**

I, BRUCE R. GARCIA, Assistant Attorney General of Texas, do hereby certify that I have electronically submitted for filing, a true and correct copy of the foregoing **Defendants' Designation of Experts** in accordance with the Electronic Case Files System of the Northern District of Texas, on this the 16th day of April, 2010.

/s/ Bruce R. Garcia  
BRUCE R. GARCIA  
Assistant Attorney General

**CERTIFICATE OF SERVICE**

I, BRUCE R. GARCIA, Assistant Attorney General of Texas, do hereby certify that a true and correct copy of the foregoing **Defendants' Designation of Experts** has been served by placing same in the United States Mail, postage prepaid, on this 16th day of April, 2010, addressed to:

James C. Harrington - Via Facsimile No. 474-0726 and Via U.S. Regular mail  
Texas Civil Rights Project  
1405 Montopolis Drive  
Austin, TX 78741-3438  
*Counsel for Plaintiff*

/s/ Bruce R. Garcia  
BRUCE R. GARCIA  
Assistant Attorney General